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October 24, 1996

**VIA FEDERAL EXPRESS**

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

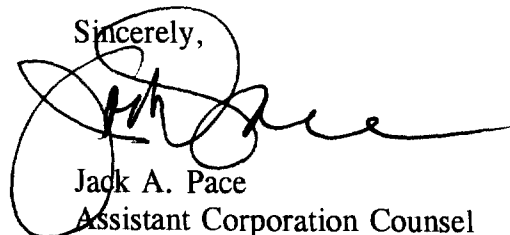
09/15/96  
OCT 25 1996  
FCC MAIL

Re: In the Matter of: Revision of the Commission's Rules  
To Ensure Compatibility with Enhanced 911 Emergency  
Calling Systems: CC Docket No. 94-102; RM-8143

Dear Mr. Caton:

On behalf of the City of Chicago, I have enclosed for filing an original and fourteen copies of its Reply Comments of the City of Chicago in the above captioned matter.

Sincerely,

  
Jack A. Pace  
Assistant Corporation Counsel  
(312) 744-6997

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**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

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FILED  
JUL 25 1996  
FCC MAIL ROOM

In the Matter of	)	
	)	
Revision of the Commission's Rules	)	CC Docket 94-102
To Ensure Compatibility with Enhanced	)	RM-8143
911 Emergency Calling Systems	)	

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**REPLY COMMENTS OF THE CITY OF CHICAGO**

The City of Chicago ("City") by its attorney, Susan S. Sher, Corporation Counsel, hereby submits its reply comments in response to the comments filed in the Further Notice of Proposed Rulemaking released July 26, 1996.

**Introduction**

As a result of the FCC's Report and Order released July 26, 1996 ("Order"), a significant disparity in the level of service will result for land-based and wireless 9-1-1 calls in Chicago. Specifically, the Order allows wireless carriers to transmit wireless 9-1-1 calls to PSAPs without account and location information to be automatically transmitted with the call.

Accordingly, unlike land-based 9-1-1 calls, the City's 9-1-1 emergency center will be unable to independently identify the identity and location of the wireless caller in cases where that information cannot be provided by the caller. Therefore, it is imperative that an extensive and comprehensive consumer education program be implemented, informing consumers of the limitations of their wireless networks for each relevant service area.

## **Consumer Education**

PSAPs and the wireless industry must work together to ensure that the consumer education program is effective. However, contrary to the view of certain commenters,<sup>1</sup> public policy supports requiring wireless carriers and wireless equipment manufacturers to be the primary parties responsible for developing and funding the consumer education program. As the FCC noted, "62 percent of cellular users cited safety and security as their main reason for purchasing a mobile phone." Report and Order, p.5. Since the industry advertises and induces the purchase of wireless telecommunications' products based on the safety and security concerns of consumers (and reaps the economic benefits resulting from those concerns), it is only fair that they have the primary obligation to make sure that consumers are fully informed as to the actual level of safety and security their product offers.

Carriers are in an especially effective position to carry out this function for several reasons. First, they already have in place a network of agents that can, among other things, set up point-of-purchase displays notifying potential purchasers of emergency calling procedures and capabilities in relevant service areas. Second, as AT&T Wireless Services, Inc. noted in its comments, carriers also have in place a monthly bill insert that could be used regularly to inform consumers of the 9-1-1 emergency services available in their service area and to provide any updates or changes as needed. AT&T Wireless at 7. Carriers would also be among the first to know when a consumer moves into a new service territory, thereby requiring a "special" notice of a potential change in the level of 9-1-1 services offered. Finally, carriers could

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<sup>1</sup> Bell Atlantic NYNEX Mobile, Inc. at 7; 360° Communications Company at 8; Personal Communications Industry Association at 11.

accompany (at a nominal cost) all of their planned (but not yet produced) print, radio and T.V. advertisements with a notice that 911 service capabilities vary by area and that they should contact their local customer representative for further information.

In addition, manufacturers should include educational information in their product packaging, as well as on the device itself to alert consumers to the fact that 911 capabilities vary by area.

Although 360° correctly points out that wireless 911 may have different features and capabilities on a PSAP-by-PSAP basis, its conclusion that the PSAP would therefore be in the best position to develop the educational program really isn't a viable solution. See 360° Comments at 8. Because of a wireless customer's mobility, the identity of the PSAP that will be responding to a 911 wireless call at any given time is unknown, and, in many cases the responding PSAP will not be the one responsible for the area where the consumer lives or works. Thus, according to the 360° proposal, each PSAP would have to inform all potential users of the system's capabilities, a difficult, if not impossible task. Since the wireless provider should, as a matter of prudent business operations, have up-to-date network information as to the features provided to all PSAP's operating in its service territory and (through industry sharing arrangements) in the service territories of all other carriers, the carrier is in the best position to be the clearing house for consumer information.

All educational mechanisms should be deployed for a substantial time prior to the transmission of wireless 9-1-1 calls. In addition, carriers should follow-up with focus groups or other mechanisms at one year intervals to gauge the effectiveness of this educational program, and to reevaluate whether additional educational measures are warranted.

Respectfully submitted,

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Corporation Counsel  
City of Chicago

By:

  
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Dated: October 25, 1996

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